

Message

From: Kay, Robert [rtkay@usgs.gov]
Sent: 6/26/2018 1:59:31 PM
To: Nordine, John [nordine.john@epa.gov]
Subject: Techalloy May 2018 Monthly Progress Report

John--I have reviewed the May 2018 Monthly Progress Report for the Techalloy/Central Wire facility in Union, Illinois. I have a few comments.

Progress Made: It is my understanding that the permit process has been going on for a number of months now, and will be delayed even longer due to what appears to be a foreseeable problem with needing an application to put the wells in the flood plain. Why didn't Autumwood know this was going to be an issue? Why didn't they deal with it sooner? This process has been unnecessarily drawn out. For example, why is the final well location being worked out just in the past couple of weeks? Does EPA have any ability to enforce a deadline for this work? At this rate the plume is going to be at some of the water-supply wells before the remedial systems are in place--if the plume isn't there already.

Table 2: not that it's cause for concern, but it's interesting that the VOC concentrations in the effluent are a fair amount higher than has typically been the case.

Tables 3, 4: it's been a few months, so I wouldn't make an issue of it for this report, but Autumwood should remember to verify the transducer measurements with manual tape down measurements.

Upcoming Activities: Autumwood should be in the process of submitting a Work Plan to investigate the location of the plume near wells EW-1 and -2. This Work Plan should be part of the larger effort to assess the adequacy of capture in this area due to the decreasing withdrawals from EW-2. Note also that the combined extraction from the EW wells continues to decline and is at its lowest rate. Per previous comments, Techalloy needs to actually address what's going on here, not just note that it's happening.

Autumwood also should be in the process of developing a Work Plan to identify the downgradient extent of the plume at the Nursery.

Finally, Autumwood should be in the process of developing a Work Plan to perform the aquifer testing that will identify the capture zone of the new extraction wells. Where are these plans?

Target and Actual Completion Dates: to my knowledge there has been no schedule provided for any past, present, or future work activities (save the routine sampling). If a schedule has been agreed upon for any of the permit process, well drilling, Geoprobe sampling, aquifer testing, etc. we have discussed with Techalloy in the past few months, it should be provided. If not, perhaps we should require one.

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